

Certificate of Notice Page 1 of 5
**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

| | | |
|---|--|---|
| Jerrold M. Howard <u>Debtor(s)</u> U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II <u>Movant</u> vs. Jerrold M. Howard <u>Debtor(s)</u> Ronda J. Winnecour <u>Trustee</u> | CHAPTER 13 NO. 23-22168 JAD 11 U.S.C. Section 362 Doc. # 81 | FILED 7/2/24 2:51 pm CLERK U.S. BANKRUPTCY COURT - WDPA |
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STIPULATION AND ORDER

AND NOW, come the undersigned parties, by and through their respective counsel, and enter into the following Stipulation:

WHEREAS, US Bank Trust National Association, not in its Individual Capacity but Solely as Trustee of LSRMF MH Master Participation Trust II , has filed a motion for relief from stay due to delinquent mortgage payments on the mortgage secured by Debtors' real property at 513-515 Vogels Lane AKA 513 Vogels Lane #513, Verona, PA 15147 (Doc. 48);

WHEREAS, Debtor has filed a response opposing relief from the automatic stay (Doc. 65)

WHEREAS, the parties enter into this Stipulation to resolve the motion for relief from the automatic stay.

It is therefore Stipulated and agreed as follows:

1. Debtor shall make all regular plan payments going forward resuming July 1, 2024.
2. Debtor shall file an Application for Loss Mitigation by July 15, 2024 or sooner.

3. Debtor shall exercise good faith in applying for loan modification.
4. Time is of the essence as to all plan payments going forward.
5. If Debtor fails to make payments as directed by this order, or if the Debtor fails to apply for loss mitigation by July 15, 2024, or if loss mitigation is unsuccessful, Secured Creditor may seek relief from the stay by filing a certification of default .
6. Relief from the automatic stay shall be effective immediately upon conversion of Debtors' case to a case under Chapter 7.
7. In the event that the automatic stay is terminated as provided by this Order, then the Trustee shall make no further disbursements to Respondent on account of its secured claim, unless directed otherwise by further Order of Court.

Consented to by:

/s/ Brent Lemon

Brent Lemon, Esquire
PA ID No. 86478
KML Law Group, P.C.
Attorney for Movant
701 Market Street, Suite 5000
Philadelphia, PA 19106
Phone: 216-627-1322
blemon@kmlawgroup.com

/s/ Albert G. Reese, Jr.

Albert G. Reese, Jr., Esquire
PA ID No. 93813
Law Office of Albert G. Reese
Attorney for Debtor
640 Rodi Road, 2nd Floor, Ste 2
Pittsburgh, PA 15235
areese8897@aol.com

/s/ James C. Warmbrodt

James C. Warmbrodt, Esquire for
Ronda Winnecour, Chapter 13 Trustee
Office of Chapter 13 Trustee, WDPA
Attorney ID 42524
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15235
jwarmbrodt@chapter13trusteewdpa.com

On this 2nd day of July, 2024, it is hereby ORDERED that
the parties' Stipulation be and hereby is APPROVED..

By the Court,

 J.
JEFFREY A. DELLER jsf

In re:
Jerrold M. Howard
Debtor

Case No. 23-22168-JAD
Chapter 13

CERTIFICATE OF NOTICE

District/off: 0315-2
Date Rcvd: Jul 02, 2024

User: auto
Form ID: pdf900

Page 1 of 2
Total Noticed: 1

The following symbols are used throughout this certificate:

| Symbol | Definition |
|--------|--|
| + | Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP. |

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 04, 2024:

| Recip ID | Recipient Name and Address |
|----------|---|
| db | + Jerrold M. Howard, 513 Vogels Lane, Verona, PA 15147-1219 |

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 04, 2024

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 2, 2024 at the address(es) listed below:

| Name | Email Address |
|----------------------|--|
| Albert G. Reese, Jr. | on behalf of Debtor Jerrold M. Howard areese8897@aol.com agreese8897@gmail.com;r41196@notify.bestcase.com;officemanager@alreeselaw.com |
| Brent J. Lemon | on behalf of Creditor U.S. Bank Trust National Association not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II blemon@kmlawgroup.com, lemondropper75@hotmail.com |
| Daniel Philip Jones | on behalf of Creditor U.S. Bank Trust National Association not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II djones@sterneisenberg.com, bkecf@sterneisenberg.com |
| Denise Carlon | on behalf of Creditor U.S. Bank Trust National Association not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust II dcarlon@kmlawgroup.com |
| Jeffrey Hunt | on behalf of Creditor Peoples Natural Gas Company LLC ecfpeoples@grblaw.com PNGbankruptcy@peoples-gas.com |

District/off: 0315-2

User: auto

Page 2 of 2

Date Rcvd: Jul 02, 2024

Form ID: pdf900

Total Noticed: 1

Keri P. Ebeck

on behalf of Creditor Duquesne Light Company kebeck@bernsteinlaw.com
btemple@bernsteinlaw.com;aepiscopo@bernsteinlaw.com;kebeck@ecf.courtdrive.com;agilbert@bernsteinlaw.com

Office of the United States Trustee

ustpreion03.pi.ecf@usdoj.gov

Ronda J. Winnecour

cmecf@chapter13trusteedpa.com

Steven K. Eisenberg

on behalf of Creditor U.S. Bank Trust National Association not in its individual capacity, but solely as Trustee of LSRMF MH
Master Participation Trust II seisenberg@sterneisenberg.com, bkecf@sterneisenberg.com

TOTAL: 9